

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:

Jayne Alexis Davis

fka Jaynee A Reeves

fka Jaynee Reeves Baptiste

Debtor.

)
)
)
)
)
)
)
)

CASE NO. 20-10767

JUDGE Ashely M. Chan

**THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK, AS
TRUSTEE FOR THE CERTIFICATEHOLDERS OF THE CWABS INC.,
ASSET-BACKED CERTIFICATES, SERIES 2005-16 NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF THE CWABS INC., ASSET-BACKED CERTIFICATES, SERIES 2005-16 ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/20 through 06/01/20. Creditor holds a secured interest in real property commonly known as 120 E 65TH AVE PHILADELPHIA, Pennsylvania 19120 as evidenced by claim number 20-2 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period

arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 07/01/20 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott’s Bridge Road, Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
Email: cwohlab@rascrane.com

CERTIFICATE OF SERVICE

I certify that I caused a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* to be served upon the following parties in the following fashion on this 18th day of May 2020:

Jaynee Alexis Davis
246 MacDonald Avenue
Wyncote, PA 19095

And via electronic mail to:

MICHELE PEREZ CAPILATO
500 Office Center Drive
Suite 400
Fort Washington, PA 19034

WILLIAM C. MILLER, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105

Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
Email: cwohlab@rascrane.com